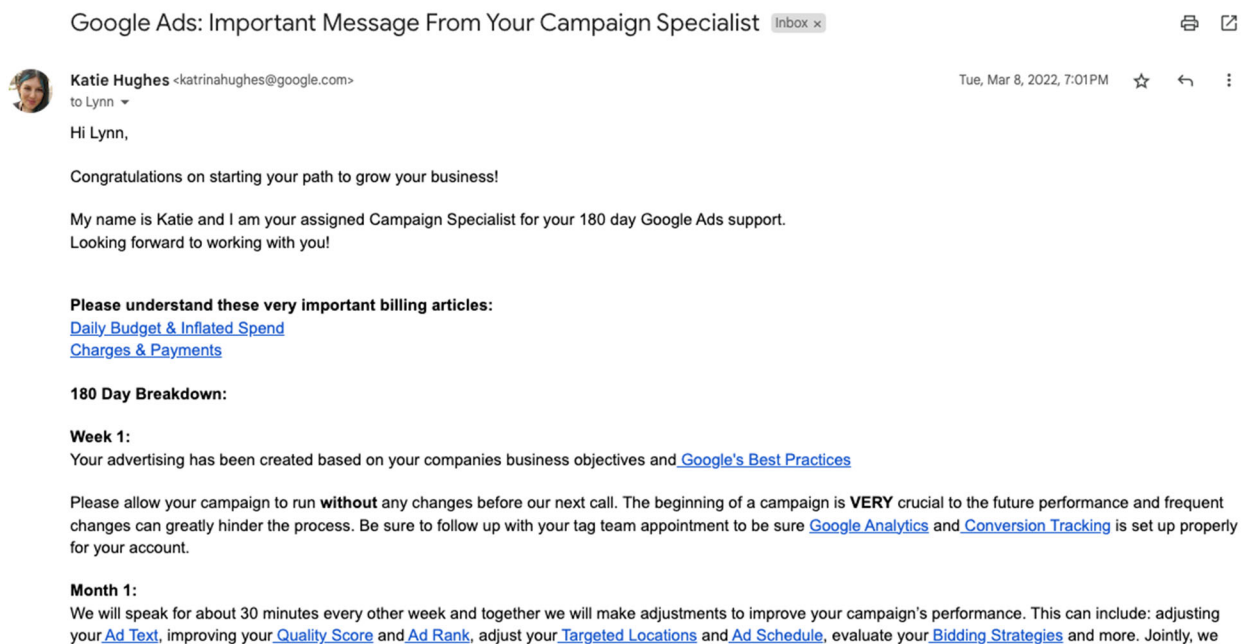


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6. Twic's Google campaign specialist was a Google employee named Katie Hughes. Ms. Hughes would set up and build out Google AdWords campaigns using brand and industry terms. Ms. Hughes and Google operated the campaign and optimized it. A screenshot of our introductory email from Ms. Hughes is shown below:



7. At the time, Twic did not have experience with Google AdWords campaigns. Therefore, we had Ms. Hughes and Google select our keywords for Google AdWords for us. To select the keywords, Google scraped information from our webpages [www.joinforma.com](http://www.joinforma.com) and used AI algorithms to generate the list of keywords. Those keywords were then used in Twic's Google AdWords campaign. This process is known as "Dynamic Bidding" or "Dynamic Search Ads."

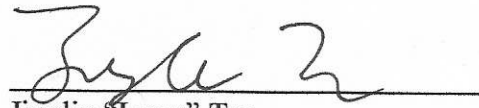
8. Once every two weeks, Rebecca Qu, Twic's Marketing Operations Coordinator, and I would meet with Ms. Hughes for an update on the campaign. Ms. Qu and I were the initial points of contact with Ms. Hughes and Google as we were part of Twic's marketing team at that time.

9. During our meetings, Ms. Hughes and Google would share with us reports of the previously purchased keywords that were performing the best. Through its Dynamic processes, Google selected the keywords and we were not aware of the keywords until after they were run. During this time, the keywords that performed the best (more than ten clicks) and included the string f-o-r-m-a were: "forma twic," "forma employee benefits," "forma benefits," "twic forma," "forma benefits platform," "joinforma," and "forma formerly twic." A screenshot of our top performing Google AdWords with the string f-o-r-m-a from February 7 through the end of June 2022 is attached to my declaration at Exhibit A.

10. Twic was not aware of the full list of keywords that Google selected and used for Twic through its Dynamic processes. Google made all the decisions and managed the campaign. Twic was not aware that Google had included "forma.ai" or "forma ai" among the keywords for the website [www.joinforma.com](http://www.joinforma.com).

I declare under penalty of perjury that the forgoing is true and correct.

Executed on this the 9<sup>th</sup> day of August, 2024.

  
Jinglin "Lynn" Tan

### CERTIFICATE OF SERVICE

I hereby certify that on this the 9<sup>th</sup> day of August, 2024 a true copy of the foregoing **DECLARATION OF JINGLIN “LYNN” TAN** was filed with the clerk of court using the CM/ECF system, which will send notification by electronic mail of such filing to all counsel of record.

By: /s/ Emily M. Haas  
Emily M. Haas  
NC State Bar No. 39,716  
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*Attorney for Twic, Inc.*

## EXHIBIT A

**None of your ads are running** - Your campaigns and ad groups are paused or removed. Enable them to begin showing your ads.

Paused    Type: Search    Budget: \$150.00/day    Simulate campaign changes    Campaign settings

### Search terms <sup>(?)</sup>

Custom Feb 7 – Jun 30, 2022    <    >

Search term contains Forma ✕    Add filter

Search term	Match type	Added/Excluded	Ad group	Clicks	↓ Imp.	CTR	Avg. CPC	Cost	Conv. rate	Conversions
Total: Filtered search terms				318	1,037	30.67%	\$1.44	\$458.51	0.00%	0.00
<input type="checkbox"/> forma twic	Exact match	None	Dynamic - All	135	378	35.71%	\$0.37	\$49.94	0.00%	0.00
<input type="checkbox"/> forma employee benefits	Exact match	None	Dynamic - All	29	98	29.59%	\$3.70	\$107.32	0.00%	0.00
<input type="checkbox"/> forma benefits	Exact match	None	Dynamic - All	29	74	39.19%	\$1.75	\$50.70	0.00%	0.00
<input type="checkbox"/> twic forma	Exact match	None	Dynamic - All	19	69	27.54%	\$0.96	\$18.18	0.00%	0.00
<input type="checkbox"/> forma benefits platform	Exact match	None	Dynamic - All	13	62	20.97%	\$5.08	\$66.07	0.00%	0.00
<input type="checkbox"/> joinforma	Exact match	None	Dynamic - All	11	43	25.58%	\$2.49	\$27.35	0.00%	0.00
<input type="checkbox"/> forma hsa	Exact match	None	Dynamic - All	8	42	19.05%	\$1.09	\$8.71	0.00%	0.00
<input type="checkbox"/> forma formerly twic	Exact match	None	Dynamic - All	12	28	42.86%	\$1.01	\$12.11	0.00%	0.00
<input type="checkbox"/> forma health	Exact match	None	Dynamic - All	8	23	34.78%	\$1.68	\$13.43	0.00%	0.00
<input type="checkbox"/> forma inc	Exact match	None	Dynamic - All	2	23	8.70%	\$1.48	\$2.96	0.00%	0.00
<input type="checkbox"/> forma flexible benefits	Exact match	None	Dynamic - All	6	20	30.00%	\$2.87	\$17.22	0.00%	0.00
<input type="checkbox"/> forma benefit	Exact match	None	Dynamic - All	5	17	29.41%	\$1.94	\$9.69	0.00%	0.00
<input type="checkbox"/> forma reimbursement	Exact match	None	Dynamic - All	4	17	23.53%	\$3.58	\$14.30	0.00%	0.00
<input type="checkbox"/> forma startup	Exact match	None	Dynamic - All	8	17	47.06%	\$0.55	\$4.37	0.00%	0.00
<input type="checkbox"/> forma wellness	Exact match	None	Dynamic - All	5	17	29.41%	\$0.45	\$2.25	0.00%	0.00